

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**KHAYREE DIXON,**

**Plaintiff,**

**vs.**

**NATIONAL RAILROAD PASSENGER  
CORP.,**

**Defendant.**

**Civil Action No. 1:24-cv-07270-AS**

**MOTION FOR PRO HAC VICE**

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, Plaintiff, through undersigned counsel, hereby move this Court for an Order granting Mary Alison Barnes admission to practice *Pro Hac Vice* and to appear as co-counsel for Plaintiff in the above-captioned action.

In support whereof undersigned attaches the Affidavit of Ms. Barnes declaring her good standing as a member of the bar(s) of the State of Louisiana, State of Alabama, and the District of Columbia, and that there are no pending disciplinary proceedings against her in any State or Federal court, that she has never been convicted of a felony, has never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached an affidavit pursuant to Local Rule 1.3.

**Respectfully submitted:**

/s/Kenneth C. Bordes  
**KENNETH C. BORDES, Esq. (N.Y. Bar No. 5336938)**  
KENNETH C. BORDES,  
ATTORNEY AT LAW, LLC  
SAVE Associates  
7722 5th Avenue  
Brooklyn, NY 11209  
Telephone: (504) 588-2700

Facsimile: (504) 708-1717  
E-Mail: *Kcb@kennethbordes.com*  
***Counsel for Plaintiff Khayree Dixon***

**CERTIFICATE OF SERVICE**

I hereby certify that the above and foregoing has been served on opposing counsel by electronically filing with the Clerk of Court via the CM/ECF system in accordance with Local Rules and Fed. R. Civ. P. 5(b)(3), on this 3rd day of March, 2025.

**/s/ Kenneth C. Bordes**  
KENNETH BORDES